

1 Pacific Gas and Electric Company, as debtor and reorganized debtor (“**PG&E**”) in the above-
2 captioned chapter 11 cases (the “**Chapter 11 Cases**”), on the one hand, and Creditor Todd Greenberg
3 (“**Greenberg**,” and together with PG&E, the “**Parties**”) on the other hand, by and through their
4 respective counsel, hereby stipulate and agree as follows:

5 **RECITALS**

6 A. On December 21, 2021, the Bankruptcy Court held a hearing to consider PG&E’s
7 objections [Dkt. Nos. 9455 and 11420] to Proof of Claim Nos. 77335, 76018, and 78381 (the
8 “**Greenberg Claims**”), filed by Greenberg in the Chapter 11 Cases. At the hearing, the Court scheduled
9 a two-day trial by Zoom on the Greenberg Claims for April 18-19, 2022 (the “**Trial Dates**”).

10 B. On February 10, 2022, the Parties entered into the *Stipulation Between Claimant Todd*
11 *Greenberg and Reorganized Debtor Pacific Gas and Electric Company to Continue Trial Date for Claim*
12 *Nos. 77335, 76081 and 78381* [Docket No. 11917].

13 C. On February 15, 2022, the Court entered the *Order Approving Stipulation Between*
14 *Claimant Todd Greenberg and Reorganized Debtor Pacific Gas and Electric Company to Continue Trial*
15 *Date for Claim Nos. 77335, 76081 and 78381* [Docket No. 11927], which continued the Trial Dates to
16 June 27-28, 2022.

17 D. On February 16, 2022, the Bankruptcy Court entered the *Scheduling Order for Remote*
18 *Trial* (the “**Scheduling Order**”) [Docket No. 11943]. The Scheduling Order provided that any motion
19 to amend the Greenberg Claims would be heard no later than March 15, 2022.

20 E. On March 4, 2022, Greenberg filed *Creditor Todd Greenberg’s Motion to Amend Claims*
21 *Numbered 77335 and 76018* (the “**Motion to Amend**”). The Motion to Amend was set for hearing on
22 April 1, 2022, which is more than two weeks past the March 15 hearing deadline set forth in the
23 Scheduling Order and is not an omnibus hearing date scheduled by the Court for these Chapter 11 Cases.
24 PG&E reserves its rights to oppose the Motion to Amend based on its untimely filing and non-
25 compliance with the Scheduling Order.

26 F. The Parties have agreed to reschedule the hearing on the Motion to Amend to the next
27 available omnibus hearing date in these Chapter 11 Cases, with the briefing schedule set forth herein.
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1 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND**
2 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**
3 **JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:**

4 1. PG&E may file and serve a response to the Motion to Amend no later than March 22,
5 2022.

6 2. Greenberg may file and serve a reply brief no later than March 25, 2022.
7 3. The hearing on the Motion to Amend be set for **March 29, 2022**, at 10:00 a.m. (Pacific
Time).

8 4. The hearing on the Motion to Amend will also be a status conference to consider any
9 amendments to the Scheduling Order or whether the Trial Dates should be continued as a result of the
10 Motion to Amend.

11 5. Nothing herein shall be construed to be a waiver by PG&E as debtor or reorganized
12 debtor, as applicable, or any other party in interest, of any rights, defenses, oppositions, objections, or
13 arguments with respect to the Motion to Amend, the Greenberg Claims, or otherwise.

14 6. In the event that the terms of this Stipulation are not approved by the Bankruptcy Court,
15 it shall be null and void and have no force or effect.

16 7. The Court shall retain jurisdiction to resolve any disputes or controversies arising from
17 this Stipulation or any Order approving the terms of this Stipulation.

19 Dated: March 17, 2022

20 KELLER BENVENUTTI KIM LLP
21 LAW OFFICES OF JENNIFER L.
22 DODGE, INC.

TRODELLA & LAPPING LLP

23

/s/ Thomas B. Rupp
24 Thomas B. Rupp
25 Attorneys for Debtors and
26 Reorganized Debtors

27

/s/ Richard A. Lapping
28 Richard A. Lapping
29 Attorneys for Todd Greenberg